

**McCARTER
& ENGLISH**
ATTORNEYS AT LAW

August 10, 2012

VIA ECF

Hon. Tonianne J. Bongiovanni, U.S.M.J.
U.S. District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

RECEIVED

AUG 14 2012

AT 8:30 ^{AM}
WILLIAM T. WALSH, CLERK

Re: Takeda Pharmaceutical Co. Ltd., et al. v. Zydus Pharmaceuticals USA Inc., et al.,
Civil Action No. 3:10-cv-01723-JAP-TJB

John E. Flaherty
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Dear Judge Bongiovanni:

We, along with our co-counsel Hogan Lovells US LLP, represent Plaintiffs in this matter. We write on behalf of all parties to request that the Court enter the following pre-trial schedule in this action:

McCarter & English, LLP
Four Gateway Center
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P.O. Box 652
Newark, NJ 07102
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Service of rebuttal expert reports: August 31, 2012.

Completion of expert discovery: September 21, 2012.

Opening pre-trial motions filed by: ~~October 5, 2012.~~

Opposition to pre-trial motions filed by: ~~October 16, 2012.~~

Hearing on pretrial motions: at the court's convenience the week of ~~October 22, 2012.~~

granted
to be set by the District Court

As Your Honor is aware, the trial is scheduled for the week of November 5, 2012. The parties believe that the proposed schedule provides for sufficient time for completion of expert discovery and for filing and briefing of pre-trial motions.

If these dates meet with Your Honor's approval, we respectfully request that you "So Order" this letter and have it entered on the docket. The parties are available to discuss this proposed schedule at the Court's convenience.

BOSTON

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NEWARK

PHILADELPHIA

STAMFORD

WILMINGTON

Respectfully submitted,

s/John E. Flaherty

John E. Flaherty

cc: Counsel of Record (via email)

Telephone Conference to be initiated by Plaintiff: Sept 26, 2012 at 11AM

SO ORDERED on this 13 day of August, 2012:


Hon. Tonianne J. Bongiovanni, U.S.M.J.